

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, NORTHERN DIVISION**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

GREEN UNITED, LLC, a Utah limited
liability company; WRIGHT W.
THURSTON, an individual; and
KRISTOFFER A. KROHN, an individual;

Defendants,

TRUE NORTH UNITED INVESTMENTS,
LLC, a Utah limited liability; and BLOCK
BROTHERS, LLC, a Utah limited liability
company;

Relief Defendants.

Case No.: 2:23-CV-00159-AMA-CMR

**UNOPPOSED MOTION FOR
EXTENSION OF TIME FOR
KRISTOPHER KROHN TO FILE
ANSWER TO FIRST AMENDED
COMPLAINT WITH JURY DEMAND
[DKT #80]**

Defendant Kristopher Krohn (“Defendant Krohn”), by and through his undersigned counsel, hereby moves the Court for a brief extension of time to answer Plaintiff’s First Amended Complaint [Dkt #80] and states as follows:

1. Plaintiff filed its First Amended Complaint on February 21, 2024. [Dkt #80]
2. Defendant Krohn filed his Motion to Dismiss on March 20, 2024. [Dkt #90]
3. The Court denied Defendant Krohn’s Motion to Dismiss on September 23, 2024. [Dkt #104]
4. Defendant Krohn’s 14-day deadline to file his Answer to Plaintiff’s First Amended Complaint currently is October 7, 2024.
5. Plaintiff’s First Amended Complaint is 31 pages long and contains nearly 130 allegations. Accordingly, Defendant Krohn seeks 10 additional days to adequately prepare his responses.
6. Plaintiff does not oppose the relief requested in this Motion.
7. There is no trial date pending, and no party will be prejudiced by the granting of this extension.

WHEREFORE, Defendant Krohn requests a 10-day extension of time through and including October 17, 2024 to file his Answer to Plaintiff’s First Amended Complaint [Dkt #80].

DATED this 7th day of October, 2024.

FOLEY & LARDNER LLP

/s/ Thomas J. Krysa

David J. Jordan
FOLEY & LARDNER LLP
95 S. State Street, Suite 2500
Salt Lake City, UT 84111
Tel. (801) 401-8919
Email: djordan@foley.com

Thomas J. Krysa (*pro hac vice*)
Stephanie Adamo (*pro hac vice*)
FOLEY & LARDNER LLP
1400 16th Street, Suite 200
Denver, CO 80202
Tel. (720) 437-2000
Email: tkrysa@foley.com
sadamo@foley.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 7th day of October, 2024, a true and correct copy of the above and foregoing **UNOPPOSED MOTION FOR EXTENSION OF TIME FOR KRISTOPHER KROHN TO FILE ANSWER TO FIRST AMENDED COMPLAINT WITH JURY DEMAND [DKT #80]** was filed and served *via* CM/ECF upon the following:

James P. McDonald
John Emmett Murphy
Troy K. Flake
Securities and Exchange Commission
351 South West Temple, Suite 6.100
Salt Lake City, UT 84101
Attorneys for Plaintiff

Jared C. Fields
9980 S. 300 W, Suite 200
Sandy, UT 84070
Attorney for Green United, LLC, Wright W. Thurston, True North United Investments, LLC, Block Brothers, LLC

/s/ Heather Kunkel

Heather Kunkel